

EDWARD C. SNUKIS, JR. and
SAMANTHA SNUKIS,
Co-Administrators of the Estate of
Edward C. Snukis

Plaintiffs

vs.

CITY OF EVANSVILLE, INDIANA;
MATTHEW O. TAYLOR, in his individual
capacity as an Evansville police officer;
TREVOR KOONTZ, in his individual
capacity as an Evansville police officer; and
NICHOLAS HACKWORTH, in his
individual capacity as an Evansville police officer

Defendants

Come now the Defendants Officer Matthew O. Taylor (“Officer Taylor”), Officer Trevor Koontz (“Officer Koontz”), and Officer Nicholas Hackworth (“Officer Hackworth”), each in their individual capacity, (Officer Taylor, Officer Koontz, and Officer Hackworth are referred to collectively as the “Defendant Officers”), by counsel and pursuant to Federal Rule of Civil Procedure 56, and designate the following evidence in support of their Motion for Summary Judgment:

- 1

5. Exhibit 5 – Koontz Vid. (Defendants’ Notice of Manual Filing)
6. Exhibit 6 – Taylor Vid. (Defendants’ Notice of Manual Filing)
7. Exhibit 7 – Use of Force Report
8. Exhibit 8 – Excerpts of Officer Koontz Deposition
9. Exhibit 9 - Excerpts of Officer Taylor Deposition
10. Exhibit 10 – Hackworth Vid. 2 (Defendants’ Notice of Manual Filing)
11. Exhibit 11 – Hackworth Vid. 1 (Defendants’ Notice of Manual Filing)
12. Exhibit 12 – Autopsy Report
13. Exhibit 13 – Excerpts of Josey Lewis Deposition
14. Exhibit 14 – Snukis Death Investigation Report
15. Exhibit 15 - Excerpts of Paul Kirby Deposition
16. Exhibit 16 – Excerpts of Operational Guidelines
17. Exhibit 17 – Affidavit of Officer Nicholas Hackworth
18. Exhibit 18 – Affidavit of Officer Matthew Taylor
19. Exhibit 19 – Affidavit of Officer Trevor Koontz
20. Exhibit 20 – Excerpts of Nicholas Hackworth Deposition
21. Exhibit 21 – Excerpts of Samantha Snukis Deposition
22. Exhibit 22 – Excerpts of Edward Snukis, Jr. Deposition
23. All pleadings filed herein
24. Dkt. 94 – Plaintiffs’ Statement of Claims

Respectfully submitted,

/s/ Clifford R. Whitehead

Robert L. Burkart, #16664-82

Clifford R. Whitehead, #28836-49
Bernard J. Lobermann, IV, #36886-49
ZIEMER STAYMAN WEITZEL & SHOULDERS, LLP
20 N.W. First Street, 9th Floor
P.O. Box 916
Evansville, IN 47706
T: (812) 424-7575
F: (812) 421-5089
E-mail: rburkart@zsws.com
cwhitehead@zsws.com
blobermann@zsws.com

Attorneys for the Defendants

CERTIFICATE OF SERVICE

I certify that on September 20, 2023, a copy of the foregoing was filed electronically. Notice of this filing will be sent to counsel of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Clifford R. Whitehead
Clifford R. Whitehead